

*KIRTON LAW FIRM*

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December 13 2021

VIA ELECTRONIC FILING

Honorable Alison J. Nathan  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Kevin Rolle, Jr. 20 cr. 594 (AJN)*

Dear Judge Nathan:


I represent Mr. Rolle in the above-referenced matter. Mr. Rolle pleaded guilty and was sentenced on November 12, 2021. I request until December 14, 2021, to make the Defense substitute Assets motion.

Mr. Rolle requested at sentencing an opportunity to contest the inclusion of item 6(j) in the Government's Substitute Assets Motion.<sup>1</sup> Counsel believes that Mr. Rolle has a meritorious claim because he did not purchase this asset with funds derived from illegal activity within the meaning of Rule 32.2 ( e) of the Federal Rules of Criminal Procedure.<sup>2</sup> The Defense motion was due on December 10, 2021. Counsel had multiple filing deadlines on December 10<sup>th</sup> and he needs additional time to submit this motion. Counsel will submit a motion on December 14, 2021. The Government consents to this application.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton



SO ORDERED. 12/13/21  
ALISON J. NATHAN, U.S.D.J.

<sup>1</sup> Government's Motion dated November 1, 2021, Exhibit A page 3; *US PACER, Docket Entry #106*.

<sup>2</sup>

Marlon G. Kirton, Esq.

cc: Danielle Kudla, Assistant United States Attorney (via electronic mail)  
Emily Johnson, Assistant United States Attorney (via electronic mail)  
Nathan Rehn, Assistant United States Attorney (via electronic mail)